



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 11, 2022

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Eric Lira*, 22 Cr. 151 (LGS)**

Dear Judge Schofield:

The Government respectfully writes following consultation with Pretrial Services and defense counsel in the above-captioned matter to respectfully request that the Court endorse this filing so that a bond may be prepared for the defendant with the bail conditions jointly proposed by the parties below. The parties' proposed bail conditions mirror those entered into by the Honorable Miguel A. Torres, U.S. Magistrate Judge in the U.S. District Court for the Western District of Texas, in the district of the defendant's initial arrest. Consequently, the Government respectfully requests that the Court endorse this filing to order the preparation of a bond for the defendant in the U.S. District Court for the Southern District of New York.

The parties respectfully propose that the Court impose the following bail conditions:

- \$100,000 bond, secured by \$100,000 deposited in the Registry of the Court
- Defendant subject to supervision as directed by Pretrial Services
- Defendant to continue or actively seek employment
- Defendant to surrender any passport or international travel documents in defendant's possession and make no new applications
- Defendant shall not travel to Mexico or any other foreign country without prior permission from the Court
- Travel restricted to El Paso County, Texas, in the Western District of Texas for all purposes, and further restricted to the Southern and Eastern Districts of New York and the Western District of Texas for purposes related to the above-captioned matter only, with prior consent of the supervising Pretrial Services officer
- Defendant to have no contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution of this matter, or with any co-defendant
- Defendant prohibited from possessing any firearm, destructive device, or other dangerous weapon

- Defendant prohibited from using alcohol
- Defendant prohibited from using or unlawfully possessing a narcotic drug or other controlled substances unless prescribed by a licensed medical practitioner
- Defendant to be subject to curfew between the hours of 10 p.m. to 6 a.m. or as otherwise directed by the Pretrial Services office, enforced by radio frequency monitoring
- Defendant to pay all or part of the cost of location monitoring based on his ability to pay
- Defendant to obtain and maintain a landline for the pendency of the above-captioned action
- Defendant to report to the Pretrial Services office every contact with law enforcement personnel, including arrests, questioning, or traffic stops
- Defendant to meet all conditions within 10 days of the Court's order imposing these conditions of release

Very truly yours,

DAMIAN WILLIAMS  
United States Attorney

by: /s Sarah Mortazavi  
Sarah Mortazavi  
Benjamin A. Gianforti  
Assistant United States Attorneys  
(212) 637-2520 / 2490

Cc: Mary Stillinger, Esq. (via ECF)